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August 15, 2016

Via ECF

Honorable Cheryl L. Pollak
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Rasulev v. Good Care Agency, Inc., No. 16 Civ. 1993-LDH-CLP

Dear Judge Pollak:

On behalf of Plaintiff Iskander Rasulev and the proposed Class we write with Defendant's consent to address three scheduling matters.

First, the parties request that Your Honor enter the following preliminary discovery schedule, which resets certain dates that were affected by a temporary discovery stay entered by Judge DeArcy Hall on July 1:

Meet and Confer Regarding ESI Discovery: **August 17**¹
Document Demands and Interrogatories: **September 2**
Responses to Document Demands and Interrogatories: **October 14**

Second, we request a brief adjournment of the status conference currently calendared for September 14, 2016. Your Honor's chambers informed Plaintiff's counsel that the Court has availability on September 20 to 22. The parties are free on those dates as well, except during the morning of September 20. At this conference the parties will request that Your Honor assist us with a number of discovery-related disputes, including Defendant's request to depose Plaintiff in early October prior to virtually all document discovery, and Defendant's refusal to discuss with Plaintiff's counsel the communications it made to Class Members whose pay was adjusted after this case was filed. In advance of the conference the parties will submit letters setting forth our positions on the outstanding issues.

Third, the parties request that the Court schedule a second conference for any time from October 25 to 27 that is convenient for the Court. While the parties intend to raise a number of issues at the September conference, the October conference is to address any discovery disputes related to the responses to document demands and interrogatories (due October 14), should any arise.

¹ The parties exchanged initial disclosures on August 12, 2016.

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Thank you for the Court's consideration.

Respectfully submitted,

/s/ Steven L. Wittels

Steven L. Wittels

cc: All Counsel of Record (*via ECF*)